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Attorney for Defendant
Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ELIAS JOSEPH KARAM,

Plaintiff,

v.

META PLATFORMS, Inc.,

Defendant.

Case No.: 25-cv-01397-LJC

**STIPULATION AND ~~PROPOSED~~
ORDER FOR BRIEFING AND HEARING
SCHEDULE OF META'S MOTION TO
DISMISS AS MODIFIED, SETTING
HEARING FOR MAY 13, 2025**

WHEREAS, on February 6, 2024, Plaintiff Elias Joseph Karam ("Plaintiff") filed an action against Defendant Meta Platforms, Inc. ("Meta") in the 224th Judicial District Court of Bexar County, Texas. Dkt. No. 2, *Karam v. Meta Platforms*, No. 2024CI04190 (Tex. Dist. & Ct., Bexar Cnty. 2024);

WHEREAS, on June 27, 2024, the action was removed to the United States District Court for the Western District of Texas, San Antonio Division. Dkt. No. 9, *Karam v. Meta Platforms*, No. 2024CI04190 (Tex. Dist. & Ct., Bexar Cnty. 2024);

WHEREAS, on July 29, 2024, Plaintiff filed the First Amended Complaint ("FAC"). Dkt. No. 15, *Karam v. Meta Platforms, Inc.*, No. 5:24-cv-720 (W.D. Tex. July 29, 2024);

WHEREAS, on August 22, 2024, Meta moved to dismiss the FAC on the basis that, among other things, (1) the parties agreed to arbitrate, (2) the venue is improper in the Western District of

1 Texas, and (3) Plaintiff's claims are insufficiently pled. Dkt. No. 17, *Karam v. Meta Platforms,*
 2 *Inc.*, No. 5:24-cv-720 (W.D. Tex. July 29, 2024); and

3 WHEREAS, on February 10, 2025, the United States District Court for the Western District
 4 of Texas, San Antonio Division granted Meta's request to transfer the action to the North District
 5 of California on the basis that "[t]his case has been filed in the wrong venue." Dkt. No. 124,
 6 *Karam v. Meta Platforms, Inc.*, No. 3:25-cv-1397 (N.D. Cal. Feb. 10, 2025). The court further
 7 held that any remaining arguments for dismissal or disputes will be resolved at the proper venue.
 8 *Id.*

9 Meta, by and through its attorneys at the law firm Orrick, Herrington & Sutcliffe LLP, and
 10 Plaintiff, in proper person, HEREBY STIPULATE AND AGREE that (1) Meta shall have up to
 11 and including March 5, 2025 to move to dismiss the FAC ("Motion"); (2) Plaintiff shall have up
 12 to and including March 26, 2025 to file Plaintiff's opposition to Meta's Motion; (3) Meta shall
 13 have up to and including April 11, 2025 to file its reply in support of its Motion; (4) to the extent
 14 the Court permits, the parties will schedule the hearing for ~~April 24, 2025~~ and agree to appear via
 15 Zoom or other remote options. **May 13, 2025**

17 **ELIAS JOSEPH KARAM**

18 /s/ Elias Joseph Karam
 19 Elias Joseph Karam
 20 louiekaram@gmail.com

21 *Pro Per Plaintiff*

ORRICK HERRINGTON & SUTCLIFFE LLP

/s/ Michelle L. Visser
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Attorney for Defendant Meta Platforms, Inc.

ORDER

IT IS SO ORDERED.



MAGISTRATE JUDGE LISA J. CISNEROS

DATED: _____ February 24, 2025

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